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*Attorneys for Defendant/Counterclaimant
Sudheer J. Surpure, MD, DDS, Inc. d/b/a
Grand Canyon Oral & Facial Surgery*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Falk Oral and Facial Surgery PLLC d/b/a
Canyon Oral and Facial Surgery, a Nevada
professional limited liability company,

Plaintiff,

vs.

Sudheer J. Surpure, MD, DDS, Inc. d/b/a
Grand Canyon Oral & Facial Surgery, a
Nevada corporation,

Defendant.

No. 2:21-cv-01464-JCM-DJA

**STIPULATION AND ORDER TO
EXTEND (1) PLAINTIFF'S/
COUNTER-DEFENDANT'S
DEADLINE TO FILE RESPONSIVE
PLEADING TO COUNTERCLAIM,
AND (2) PARTIES' DEADLINE TO
FILE JOINT DISCOVERY PLAN
AND PROPOSED SCHEDULING
ORDER**

[SECOND REQUEST]

Sudheer Surpure, MD, DDS, Inc. d/b/a
Grand Canyon Oral & Facial Surgery, a
Nevada corporation,

Counterclaimant,

vs.

Falk Oral and Facial Surgery PLLC d/b/a
Canyon Oral and Facial Surgery, a Nevada

professional limited liability company,
Counter-defendant.

Pursuant to LR IA 6-1, Defendant Sudheer J. Surpure, MD, DDS, Inc., dba Grand Canyon Oral & Facial Surgery (“Defendant”) and Plaintiff Falk Oral and Facial Surgery PLL dba Canyon Oral and Facial Surgery (“Plaintiff”) submit the following Stipulation to Extend Time to file (1) Plaintiff’s/Counter-defendant’s responsive pleading to Counterclaim up to and including November 24, 2021, and (2) the parties’ Joint Discovery Plan and proposed Scheduling Order up to and including November 29, 2021. In support of the Stipulation, the parties state the following:

1. Plaintiff’s/Counter-defendant’s responsive pleading to the Counterclaim is currently due October 25, 2021. (ECF No. 21)

2. The parties’ Joint Discovery Plan and proposed Scheduling Order is currently due October 29, 2021. (ECF No. 21)

3. The parties are in active settlement discussions and thus wish to extend upcoming deadlines.

4. This is the second request to extend the deadline for Plaintiff/Counter-defendant to file its responsive pleading to Counterclaim, and for the parties to file their Joint Discovery Plan and proposed Scheduling Order.

5. This request for an extension of time is not intended to cause any undue delay or prejudice any party.

6. Therefore, the parties hereby stipulate that the deadline for Plaintiff/Counter-defendant to file its responsive pleading shall be extended to November 24, 2021.

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7. The parties further stipulate that the deadline for the parties to file their Joint Discovery Plan and proposed Scheduling Order be extended to November 29, 2021.

RESPECTFULLY SUBMITTED this 25th day of October, 2021.

MILLIGAN LAWLESS, P.C.

By: /s/ Robert J. Itri
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By: /s/ Christopher Austin (w/permission)
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IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: October 26, 2021

CERTIFICATE OF SERVICE

I hereby certify that on October 25, 2021, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants below:

F. Christopher Austin caustin@weidemiller.com

Jing Zhao jzhao@weidemiller.com

/s/ Jeanette Burkey